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July 8, 2014

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Hon. Paul G. Gardephe  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 920  
New York, New York 10007

**MEMO ENDORSED***The Application is granted,**SO ORDERED:**Paul G. Gardephe, U.S.D.J.**Dated: July 24, 2014.*

*the Clerk will enter the  
motion as filed  
in each of  
the referenced  
actions.*

Re: The Martin Hilti Family Trust v. Knoedler, et al., 13 Civ. 0657 (PGG)  
White v. Freedman, et al., 13 Civ. 1193 (PGG)  
The Arthur Taubman Trust, et al. v. Knoedler, et al., 13 Civ. 3011 (PGG)  
Manny Silverman Gallery, et al. v. Knoedler, et al., 13 Civ. 8495 (PGG)  
Cohen, et al. v. Freedman, et al., 13 Civ. 8515 (PGG)

Dear Judge Gardephe:

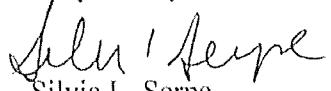
This firm represents defendant Jaime R. Andrade, who is a defendant in all of the above-referenced matters, except for The Arthur Taubman Trust case. I write respectfully on behalf of all the parties in the above-referenced matters to jointly request that the Court amend its July 3, 2014 Order to reflect a modified briefing schedule for submission of motions to dismiss in order to accommodate various lawyers' summer schedules. The following proposed schedule will not affect discovery in any of the matters:

1. Motions to dismiss for all Defendants except Defendant Andrade are due on August 15, 2014. Defendant Andrade's motion to dismiss is due on August 20, 2014.
2. Plaintiffs' oppositions are due on October 7, 2014;
3. Replies for all Defendants except Defendant Andrade are due on November 4, 2014. Defendant Andrade's reply is due on November 7, 2014;
4. If Defendant Andrade does not move to dismiss, his answers in all matters (except The Arthur Taubman Trust matter) are due on October 7, 2014.

Accordingly, the parties jointly request that the Court endorse this letter. Thank you for your consideration of this request.

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Respectfully,

  
Silvia L. Serpe

cc: All Counsel of Record by ECF